

AFFIDAVIT OF STEPHEN CONWAY

I, Stephen Conway, being duly sworn and upon my oath, state as follows:

1. I am employed by the City of St. Louis as the chief of staff for Mayor Lyda Krewson.

2. On multiple occasions during the last two weeks I have personally toured and inspected encampments of the homeless in the City parks along Market Street, west of Tucker. The conditions were filthy and large groups of individuals were not maintaining at least six-feet social distancing from others, contrary to guidelines and order issued by federal and state officials, as well as the City's health commissioner.

3. The encampments appeared after the inception of the COVID-19 pandemic. I worked with the City's health commissioner, Dr. Fredrick Echols, to implement a plan to test and protect the encampment occupants from the spread of COVID-19.

4. I toured and inspected the encampments on April 30, 2020. There were between 38 and 48 occupants in total.

5. The photographs attached hereto are true and accurate depictions of the conditions that I observed. I observed rotting food, rat nests, syringes and condoms on the ground and piles of trash. All of this was present despite daily cleanup efforts by staff at the City's Parks Department.

5. In the morning hours of May 1, 2020, I observed that many of those encampment occupants have packed their things, or abandoned them, and departed.

6. On April 30, 2020, I observed the removal of a food distribution tent that had been serving the homeless in the encampments.

7. In recent weeks I worked with the City's health commissioner, Dr. Fredrick Echols, to implement a plan to test and protect the encampment occupants from the spread of COVID-19. Testing began on April 30, 2020 and was available to all occupants of the encampment. Those who test positive for COVID-19 will be provided appropriate medical care.

8. Transportation and lodging is being offered and provided to all occupants of the encampment. The City executed agreements with three hotels to provide guest rooms for the homeless, with transportation and other services provided. At present, 50 or more hotel rooms remain available.

9. The City also leased facilities previously operated by the Little Sisters of the poor to house the homeless. Some floors are reserved for medical care or quarantine as needed. There are currently 17 or more vacancies at that facility.

10. The City also renovated a former recreation center for use as a shelter. That facility would normally accommodate 100 people, but social distancing and other measures have been implemented and the number of occupants will be limited to 28 in light of the COVID-19 pandemic.

11. Notices were posted in and around the encampment advising occupants that they would no longer be allowed to camp in City parks, effective the morning of May 1, 2020. The notices included information regarding how they could obtain transportation and shelter.

12. By law, City parks have a 10 p.m. curfew. City ordinance
13. The above-described testing and shelter efforts are designed to protect the health and safety of the homeless occupants of the encampments and to prevent the spread of COVID-19. The encampments pose a threat to the health and safety of the homeless and the general public.
14. Today's action by the City to close the encampment was not done until it procured lodging that is more than sufficient to meet the shelter and medical needs of the encampment occupants.
15. Encampment occupants are not being arrested. If they refuse the lodging and assistance offered by the City they are required to leave the park grounds.
16. All belongings abandoned or left in the City parks were bagged and stored in order to provide owners an opportunity to claim their belongings.



Stephen Conway

The foregoing Affidavit sworn to and subscribed before me this 1 day of May, 2020.



Diane March

Notary Public



April 8, 2020 - Schiller Statue Park



April 29, 2020



Poelker Park – man in his 60's went to hospital with EMS.



Discarded syringe in Schiller Statue Park



Rat nests in Schiller Statue Park.







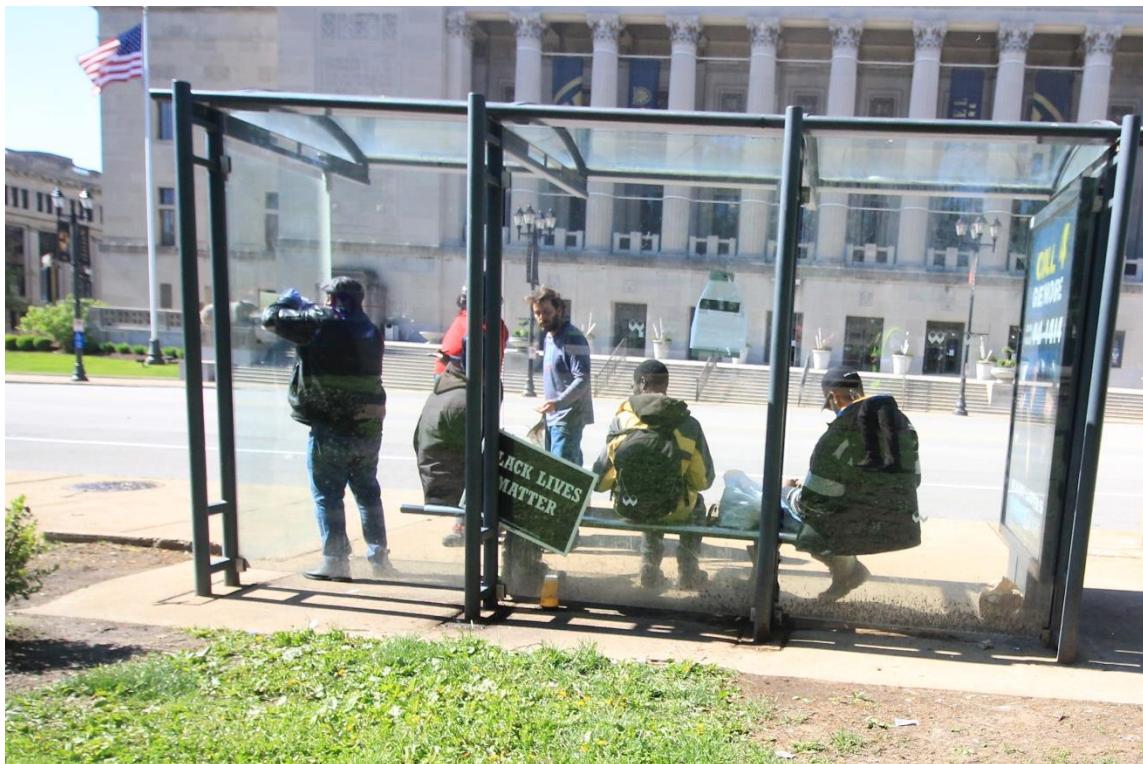
Food waste among tents.



Tent is filled with garbage and food waste.

April 30, 2020

Bus shelter is frequently full of people.



Aggressive behavior to health workers.









Gathering at Schiller Statue.



Rat nests in Schiller Park.